ORIGINAL DOCKET FILE COPY ORIGINAL

RECEIVED
APR 16 1993
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Amendment of Parts 2, 22, 90	)	
and 94 of the Commission's Rules	)	RM-8200
and Regulations to Permit Routine	)	
Licensing and Use of Bi-Directional	)	
Signal Boosters	)	

COMMENTS OF ALLEN TELECOM GROUP

Allen Telecom Group ("ATG")[1] submits these comments in support of the above-captioned Petition for Rulemaking of TX RX Systems, Inc. ("TX RX").

Allen Telecom Group is a manufacturer of the type of bi-directional signal boosters that are the focus of this proceeding. We sell bi-directional signal boosters to cellular licensees to fill in weak signal areas, and we believe their use should be approved in the private radio services as well. There is a need for such capability, particularly by 800 MHz SMR and public safety land mobile licensees.

No. of Copies rec'd 0+6
List A B C D E

[1]ATG, through its subsidiaries The Antenna Specialists Co., Decibel Products and Grayson Electronics, is a leading manufacturer and supplier of mobile communications products, site management products and services, and base station electronics.

We are aware of public safety agencies, whose emergency operations centers are in protected basement locations, that have encountered severe communications problems during power outages because portable radios intended as backups for dispatching purposes were unable to communicate with base stations. The EOCs, because of their underground locations, were in "dead spots" with respect to the base station. Bi-directional signal boosters installed in the EOCs would alleviate such problems. Similar problems have been experienced in many buildings by other 800 MHz mobile radio users.

We believe that the approach proposed by TX RX, with some improvements suggested

Finally, we believe that this rulemaking proceeding should be enlarged slightly to incorporate booster/translators. We believe there is a public need in rural areas for a booster that can be used by SMRs and other licensees to extend their coverage area at minimal cost. The licensee would of course apply for and receive licenses for the additional frequencies at the new locations. TX RX has made a similar proposal. See TX RX Petition at footnote 17.

The advantage of such a booster/translator approach is simplicity and lower cost than a full base station. The disadvantage is potentially inefficient use of the radio spectrum, since the same radio traffic would be repeated on additional frequencies. Consequently, marketplace economics dictate that this approach will be employed only in areas of low traffic, where there is low demand for radio frequencies. If the SMR licensee is able to use the translator frequencies to carry separate revenue-producing traffic rather than repeating the traffic from the main base station, then he will choose to install a full base station. But if demand is low, a low power translator/repeater would be a better choice. The same public policy benefits that led to the development of low power TV translator stations (See Part 74 Subpart G of the Commission's Rules) in rural areas would support the use of booster/translators in the private land mobile service. We envision that a booster/translator product would channel selectivity filters to receive and amplify only the intended channels.

Consequently, we propose that the following be added to the proposed definitions in Part 90:

Signal Booster/Translator: A device which automatically receives, amplifies and retransmits, on a one-way or two-way basis, the signals received from base stations, mobile and portable units, with a change in frequency but no change in authorized bandwidth.

In addition, the proposed Section 90.219 should be modified to read "common frequency signal boosters and signal booster/translators" in place of "common frequency signal boosters," and Section 90.219(a) should be modified to begin "For common frequency signal boosters, the amplified signal ...."

In light of these considerations, we support the TX RX Petition for Rulemaking and we urge the Commission to begin a rulemaking proceeding to adopt the proposed changes.

Respectfully submitted,

Cleve Watkins
Vice President, Technology
Allen Telecom Group
30500 Bruce Industrial Parkway
Cleveland, OH 44139
216-349-8418

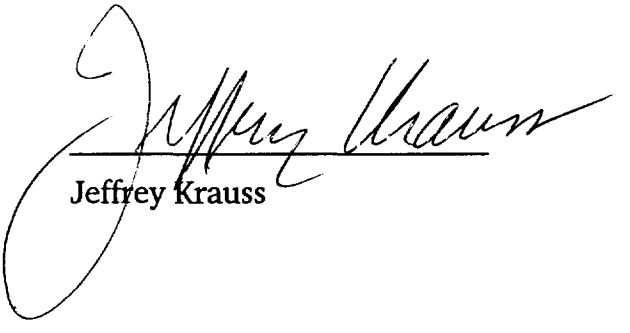
Jeffrey Krauss
Consultant
17 West Jefferson Street
Suite 106
Rockville, MD 20850

Date: April 16, 1993

Certificate of Service

I hereby certify that on this 16th day of April, 1993, a copy of the foregoing Comments of Allen Telecom Group was served by first class mail, postage prepaid, on the following:

Raymond Kowalski
Keller & Heckman
1001 G Street NW
Suite 500 West
Washington, DC 20001



Jeffrey Krauss